## APPENDIX B: YEAR BY YEAR ATTORNEYS' FEES AND COSTS BY CASE

2015	Willoughby	Ellot	Terrenl	Haynsworth	Baker	Reinhart	Winston	Total
Case	Hours Cost	Hours Cast	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cost
CRK v. CWS	232 \$ 61,308,00	- 5 -	- \$	- \$	. 5 .	. s .	- 5 -	231.50 \$ 61,308.00
Town of Lexington v. CWS (condemnation)	1 \$ 400.50	- \$ -			- \$ -			1 \$ 400.50
ALC - DHEC Permit Denial	11 5 3,366.00	. 5 -	. 5	. 5	. \$ -	. 5 -	. 5 .	11 \$ 3,366:00
ALC - I-20 Connection	8 \$ 2,412.00	. 5 -	- 5 -	. \$ -		- \$ .		8 .\$ 2,412.00
CWS v. EPA	158 \$ 38,439.00	1 \$ 150.00		- \$ -	- \$ .	- \$ -	- s · l	159 \$ 38,589.00
Total	410 \$ 105,925.50	1 \$ 150.00					- 5 -	411 \$ 106,075.50
	500	1(9)(	19 80	106				
Expenses	\$ 446.47	\$ .	5 -	5 -	5	5 -	\$ -	\$ 446.47
Advances	\$ -	\$	\$ .	\$ .	\$ .	ş -	\$ - [	\$ -
Total from Breakdown of Costs	\$ 106,371.97	\$ 150.00	\$ -	\$ -	\$ -	ş .	\$ - <u> </u>	\$ 106,521.97
						-		
2016	Willoughby	Elliot	Terreni	Haynsworth	Baker	Reinhart	Winston	Total
Case	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cast	Hours Cast
CRK v. CWS	973 5 235,835.00	\$			\$	· \$ 1,195.25	30 \$ 19,912.00	1,000,00 \$ 257,943.25
Town of Lexington v. CWS (candemnation)	34 \$ 9,747.00		. \$		· \$ ·	· \$ -	- \$ -	34 5 9,747.00
ALC - DHEC Permit Denial	305 \$ 82,390.50	0 \$ 87.50	1 \$ 220.00	- \$ -	. 5 -	. \$ .		906 \$ 82,698.00
ALC - I-20 Connection	148 5 39,501.00	2 \$ 412.50	- \$ -	. 2	- 5		. \$ .	150 \$ 39,913.50
CWS v. EPA Total	422 5 107,741.25 1,882 \$ 476,214.75	2 \$ 500.00	1 \$ 220.00			\$ 1,196.25	30 \$ 19,912.00	422 \$ 107,741.25 1,915 \$ 498,043.00
10791	1,685 3 470,614.73	2 3 300.00	1 9 210.00	. , .	. , , ,	2,130.23	30 3 19,312.00	1,913 3 490,043.00
Expenses	\$ 4,436.05	\$	\$			\$ 5.85	\$ 465.37	\$ 4,907.27
Advances	\$ 27,680.23	Š -	Š	I ( )	ś .	{ ~~''	\$ 1000	\$ 27,680.23
Total from Breakdown of Costs	\$ 508,331.03	\$ 500.00	\$ 220.00	lš.	Ĭ.	\$ 1,202.10	\$ 20,377,37	\$ 530,630.50
TOTAL POIN DEPARTMENT COSTS	\$ sucjourne	, J.						
2017	Willaughby	Ellot	Terreni	Haynsworth	Baker	Reinhart	Winston	Total
Case	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cost	Hours Cost
CRK v. CWS	311 \$ 77,260.50	. \$ .	1 \$ 165.00	- \$ .	- \$ .	. \$ .	· s -	311.90 \$ 77,425.50
Town of Lexington v. CWS (condemnation)	163 S 49,459.50	. s -	- \$ -	- S -	35 \$ 14,640.00	- 5 -	. \$ -	196 \$ 64,099.50
ALC - DHEC Permit Denial	529 S 147,159.00	. s -	. \$ .	~ \$ .	- \$ .		- \$ -	529 \$ 147,159.00
ALC - I-2D Connection	19 \$ 5,728.50	\$ -	. 5 -	17 \$ 2,985.00	\$ -	/ \$ -	. \$ .	36 \$ 8,713.50
CW5 v. EPA	0 \$ 90.00							0 \$ 90.00
			. \$ .		- \$ -	• • -	. 5 -	
Total	1,022 \$ 279,697.50	- s	1 \$ 165.00	17 \$ 2,985.00	35 \$ 14,640.00	- \$ -	. \$ -	1,075 \$ 297,487.50
		s I	1 \$ 165.00	17 \$ 2,985.00	35 \$ 14,640.00	- \$ - - \$ - - %	\$ -a	1,075 \$ 297,487.50
Expenses	\$ 5,962.94	\$ .	I \$ 165.00	17 \$ 2,985.00 \$ 151.68		· \$ -	\$	1,075 \$ 297,487.50 \$ 6,928.97
Expenses Advances	\$ 5,962.94 \$ 47,148.00	\$ \$ \$	1 \$ 165.00 5 -	17 \$ 2,985.00 \$ 151.68 \$	35 \$ 14,640.00 \$ 804.95 \$	. \$ - - \$ - - \$ 5 -	\$ -	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00
Expenses	\$ 5,962.94	\$ .	I \$ 165.00	17 \$ 2,985.00 \$ 151.68	35 \$ 14,640.00	· \$ - - \$ - - · · · 5 - 5 -	, ,	1,075 \$ 297,487.50 \$ 6,928.97
Expenses Advances Total from Breakdown of Costs	\$ 5,962.94 \$ 47,148.00 \$ 332,808.44	\$ 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	1 \$ 165.00 5 . \$ 165.00	17 \$ 2,985.00 \$ 151.68 \$ \$ 3,146.08	35 \$ 14,640.00 \$ 804.95 \$	\$ - \$ . \$ . \$ .	\$ . \$ -	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00 \$ 351,564.47
Expenses Advance; Total from Breakdown of Costs 2018	\$ 5,962.94 \$ 47,148.00	\$ \$ \$	1 \$ 165.00 5 . 5 . \$ 165.00	17 \$ 2,985.00 \$ 151.68 \$	35 \$ 14,640.00 \$ 804.95 \$ 15,444.95	\$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ -	, ,	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00
Expenses Advances Total from Breakdown of Costs	\$ 5,962.94 \$ 47,148.00 \$ 332,808.44 Willoughby	- \$	1 \$ 165.00 5 : 5 : 5 : 165.00	17 \$ 2,985.00 \$ 151.68 \$ \$ 3,146.08	35 \$ 14,640.00 \$ 804.95 \$ \$ 15,444.95	\$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ -	\$ - \$ - Winston	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00 \$ 351,564.47
Expenses Advances Total from tireskelown of Coats 2018 Case	\$ 5,962.94 \$ 47,148.00 \$ 332,808.44 Willoughby	- \$	1 \$ 165.00	17 \$ 2,985.00	35 \$ 14,640.00 \$ 804.95 \$ \$ 15,444.95	\$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ -	\$ - \$ - Winston Hours Cost	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00 \$ 351,564.47 Total
Expensas Advances; Total from Breakdown of Coats  2018 Case CREV.CWS	\$ 5,962,94 \$ 47,148,00 \$ 332,808,44 Willoughby Hours Cost	S - S - S - S - S - S - S - S - S - S -	1 \$ 165.00 \$ 165.00 Terrent Nours Cost	17 \$ 2,985.00 5 151.68 \$ 3,146.08 Haynsworth Hours Cost	35 \$ 14,640.00 \$ 804.95 \$ \$ 15,444.95	S S S S S S S S S S S S S S S S S S S	Winston Hours Cost - \$ -	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00 \$ 351,564.47 Total Hours Cost
Expensis Advance: Total from Breakdown of Costs  2018 Cape CREV.CVS Town of Leefiglion V. CVS (Condemnation)	\$ 5,962,94 \$ 47,148,00 \$ 332,808.44 Willoughby Hours Cost \$	S S S S S S S S S S S S S S S S S S S	1 \$ 165.00 5 \$ 165.00 Terrent  Hours Cast - 5 \$ .	17 \$ 2,985.00 5 151.68 \$ 3,146.08  Haynsworth Hours Cost. 19 \$ 4,235.00	35 \$ 14,640.00  \$ 804.95 \$ 15,444.95  Baker  Hours Cost \$ .	S S S S S S S S S S S S S S S S S S S	\$	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00 \$ 353,554.47 Total Hours Cost 19 \$ 4,235.00
Expensis Advances: Total from Breakdown of Casts  2018 Case CREV. CWS (Condemnation) ALC -1/20 Cannection CWS V.EVA	\$ 5,962,94 \$ 47,148.00 \$ 332,808.44 Willoughby Hours Cost \$ 5	S	1 \$ 165.00  5 \$ 165.00  Terrent  Hours Cast  - S S S .	17 \$ 2,985.00  5 151.08  \$ 3,146.08  Haynsworth  Hours  5 5  19 \$ 4,235.00  5 5  5 5  5 5	35 \$ 14,640.00  \$ 804.95  \$ 15,444.95  Baker  Hours  Cost  \$ \$	S S S S S S S S S S S S S S S S S S S	\$ -   Wilnston Hours Cost   -   -   5 -   -   5 -	1,075 \$ 297,497.50 \$ 6,928.97 \$ 471,48.00 \$ 352,564.47 Total Hours Cost \$ 5 \$ 19 \$ 4,235.00 \$ 5 \$ 5
Expensis Advance: Total from tirenkdown of Costs  2018 Case CRV.CVS Town of Leefigton V.CVS (Condemnation) ALC - DNIC Permit Dehal ALC - LP3C Connection	\$ 5,062,94 \$ 47,148,01 \$ 332,808,44 Wilkbughby Hours Cost \$ \$ 5 \$ 5	S	1 \$ 165.00  \$ \$ 165.00  Terrent  Hours  Cant  \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	17 \$ 2,985.00  5 151.08  5 3,146.08  Haynsworth  Heurs Cost 5 4,235.00 5 4,235.00	35 \$ 14,640.00  \$ 804.95  \$ 15,444.95  Baker  Hours  Cost  \$ \$	S S S S S S S S S S S S S S S S S S S	\$ -   Wilnston Hours Cost   -   -   5 -   -   5 -	1,075 \$ 2877,487.50 \$ 6,928.97 \$ 47,148.00 \$ 383,564.47 Total  Hours Cost  19 \$ 4,235.00  \$ \$
Expensis Advances: Total from Breakdown of Casts  2018 Case CREV. CWS (Condemnation) ALC -120 Connection LC	\$ 5,062,94 \$ 47,148,00 \$ 332,808,44 Wilkoughby Hours Cost \$ \$ 5 5 5 5 5 5 5	S S S S S S S S S S S S S S S S S S S	1 \$ 165,00	17 \$ 2,985.00  \$ 151.08  \$ 2,146.00  Haynon-orth  Hours Cost  19 \$ 4,235.00  19 \$ 4,235.00	35 \$ 14,640,00  \$ 804,95 \$ 15,444,95  Baker  Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S S S S S S S S S S S S S S S S S S S	Winton   Hours   Cost	1,075 \$ 287,487.50  5 6,924.97  5 47,146.00  5 853,564.47  Total  Hours  Cost  5 4,235.00  5 5  5 5  19 \$ 4,235.00
Expensis Advances: Total from treakdown of Costs  2018 CREV. CVS Town of Leckgrow v. CVS (condemation) ALC - DREC Perith Debail ALC - LP3 Connection CVS v. LP3 Total Expenses	\$ 5,052,94 \$ 47,148,001 \$ 332,808,44 Wilkoughby Hours Cost \$ 5 5 5 5 5 5 5	S   S   S   S   S   S   S   S   S   S	1 \$ 165.00  5 \$ 165.00  Terrent  Hours \$ Cast \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$	17 \$ 2,985.00  5 151.08  \$ 3,146.08  Haynsworth  Hours  5 5  19 \$ 4,235.00  5 5  5 5  5 5	35 \$ 14,640.00  \$ 804.95  \$ 15,444.95  Baker  Hours  Cost  \$ \$	S S S S S S S S S S S S S S S S S S S	Winston   Hours   Cost	1,075 \$ 287,487,50 \$ 6,028,97 \$ 47,148,00 \$ 851,564,47 Total Hours Cost \$ 5 \$ 9 \$ 4,235,00 \$ 4,235,00 \$ 9 4,235,00 \$ 37,20
Expensis Advances: Total from Breakdown of Casts  2018 Case CREV. CWS (Condemnation) ALC -120 Connection LWS v.CMS (Condemnation) ALC -120 Connection LWS v.PM Total Expensis Advances	5 5.052.94 \$ 47,148.00 \$ 332,808.44 Wilkoughby Hours Cost 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	S   S   S   S   S   S   S   S   S   S	1 \$ 165,00	17 \$ 2,985.00  \$ 151.08  \$ 2,146.00  Haynone-orth  Neurs Cost  19 \$ 4,235.00  \$ 37.20  \$ 37.20	35 \$ 14,640,00  \$ 804,95 \$ 15,444,95  Baker  Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S S S S S S S S S S S S S S S S S S S	Winton   Hours   Cost	1,075 \$ 287,487.50  5 6,928,97  5 47,146.00  5 853,564.47  Total  Hours  Cost  19 \$ 4,235.00  5 \$ 37.20  5 37.20
Expensis Advances: Total from treakdown of Costs  2018 CREV. CVS Town of Leckgrow v. CVS (condemation) ALC - DREC Perith Debail ALC - LP3 Connection CVS v. LP3 Total Expenses	\$ 5,052,94 \$ 47,148,001 \$ 332,808,44 Wilkoughby Hours Cost \$ 5 5 5 5 5 5 5	S   S   S   S   S   S   S   S   S   S	1 \$ 165.00  5 \$ 165.00  Terrent  Hours \$ Cast \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$	17 \$ 2,985.00  \$ 151.08  \$ 2,146.00  Haynon-orth  Hours Cost  19 \$ 4,235.00  19 \$ 4,235.00	35 \$ 14,640,00  \$ 804,95 \$ 15,444,95  Baker  Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S S S S S S S S S S S S S S S S S S S	Winston   Hours   Cost	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00 \$ 851,564.47  Total  Hours Cost \$ 5 \$ 9 4,235.00 \$ 5 \$ 4,235.00 \$ 5 \$ 7,720
Expensis Advances: Total from Breakdown of Casts  2018 Case CREV. CVIS Town of Leeington, CWS (condemnation) ALC -120 Connection LWS V.EPA Total Expensis Advances Total from Breakdown of Costs,	5 5.U62.94 \$ 47,148.00 ; \$ 332,808.44 Willoughby Hours Cost \$ 5 6 7 8 9	S   S   S   S   S   S   S   S   S   S	1 \$ 165,00  5 \$ 165,00  Terrent  Hours Cast	17 \$ 2,985.00  \$ 151.08  \$ 2,146.08  Hayntheorth  Hours Cost  19 \$ 4,235.00  \$ 37.20  \$ 4,222.20	35 \$ 14,640,00  \$ 804,05 \$ 15,444,95  Baker  Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	Reinhart  Heurs Cost  5 5 - 5 - 5 5 - 5 5 5 5 5 5 5 5 5 5 5	\$ - Wilston Hours Cost   5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5	1,075 \$ 287,487.50 \$ 6,928.97 \$ 47,146.00 \$ 853,564.47  Total  Hours Cost \$ 19 \$ 4,235.00 \$ 5 4,235.00 \$ 5 7.20 \$ 5 4,225.00 \$ 5 7.20 \$ 5 4,272.20
Expensis Advances: Total from treakdown of Costs  2018 Gaye CRV.CV/5 Town of Lecksgron v. CWS (condemnation) ALC - DRICE Permit Dehal ALC - LP3 Connection CLYS v. EPA Total Expenses Advances Total from Beakdown of Costs.	\$ 5,052,94 \$ 47,148,001 \$ 332,808,44 Wilkoughby Hours Cost \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$ . \$ .	S   S   S   S   S   S   S   S   S   S	1 \$ 145.00	17 \$ 2,985.00  \$ 151.08  \$ 3,146.00  Haynoworth  Hours	35 \$ 14,640,000  \$ 803,05  \$ 15,444,95  Baker  Hours Cost \$ 5  \$ 5  \$ 5  \$ 5  \$ 5  \$ 5  \$ 5  \$ 5	S   S   S   S   S   S   S   S   S   S	Wilnston   Wilnston	1,075 \$ 297,487.50 \$ 5 6,928.97 \$ 47,148.00 \$ \$ \$51,564.47  Total  Hours Cost \$ 5 \$ 9 \$ 4,235.00 \$ 5 \$ 7 \$ 4,235.00 \$ 5 37.20 \$ 5 \$ 4,772.20  Total
Expensis Advances: Total from Breakdown of Casts  2018 Crese CREV. CVS (Condemnation) ALC -120 Connection LVS S. 2PA Total Expensis Advances Total from Breakdown of Costs,  TOTAL Case	\$ 5,052,94 \$ 47,148,00 \$ 332,808.44 Willoughby Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S   S   S   S   S   S   S   S   S   S	1 \$ 165,00  5 \$ 165,00  Terrent  Mours Cast	17 \$ 2,985.00  5 151.68  \$ 3,146.08  Haynoworth  Mours Cost  19 \$ 4,235.00  \$ 37.20  \$ 4,222.20  Haynoworth  Hours Cost	35 \$ 14,640,00  \$ 804,05 \$ 15,444,95  Baker  Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S   S   S   S   S   S   S   S   S   S	\$ - Wilston  Hours Cost   S   S   S   S   S   S   S   S   S	1,075 \$ 287,487,50 \$ 6,928,97 \$ 47,148.00 \$ 385,354.47  Total  Hours Cost \$ 9 4,235.00 \$ 37,20 \$ 4,272.20  Total  Hours Cost
Expensis Advances: Total from treakdown of Costs  2018 Gaye (Rev. CV/5) Town of Leeington v. CWS (condennation) ALC - DNEC Permit Denail ALC - LP3 Commercion CMS v. EPA Total Expenses Advances Total from Beakdown of Costs.  TOTAL Gase CREV. CWS	5 5.052.94 \$ 47,148.00   \$ 332,808.44    Wilkoughby  Hours Cost  5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	S   S   S   S   S   S   S   S   S   S	1 \$ 145.00	17 \$ 2,985.00  5 151.08  \$ 3,146.08  Haynoworth  Hours	35 \$ 14,640,000  \$ 803,05 \$ 15,444,95  Baker    Hours   Cost   \$ 5   \$ 7	S   S   S   S   S   S   S   S   S   S	Wilnston   Hours   Cost	1,075 \$ 297,487.50 \$ 5 6,928.97 \$ 47,148.00 \$ 5851,564.47  Total  Hours Cost \$ 5 \$ 9 4,235.00 \$ 5 37.20 \$ 5 4,772.20  Total  Hours Cost \$ 19 \$ 4,235.00 \$ 5 4,772.20  Total  Hours Cost
Expensis Advances: Total from Breakdown of Casts  2018 Crese CREV. CVIS Town of Leeington V. CWS (condemnation) ALC -120 Connection LWS V.EPA Total Expensis Advances Total from Breakdown of Costs,  TOTAL Case CREV. CWS Town of Leeington V. CWS (condemnation)	5 5.052.94 \$ 47,145.00; \$ 332,808.44  Wilkoughby  Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S   S   S   S   S   S   S   S   S   S	1 \$ 165.00      \$ 165.00  Terrent  Mours	17 \$ 2,985.00  5 151.68  \$ 3,146.08  Haynoworth  Mours Cost  19 \$ 4,235.00  \$ 37.20  \$ 4,222.20  Haynoworth  Hours Cost	35 \$ 14,640,00  \$ 804,95 \$ 15,444,95  Baker  Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S   S   S   S   S   S   S   S   S   S	Wilston   Hours   Cost	1,075 \$ 287,487.50 \$ 6,928.97 \$ 47,148.00 \$ \$ \$51,564.47  Total  Hours Cost \$ \$ \$ 4,235.00 \$ \$ 4,235.00 \$ \$ 4,235.00 \$ \$ 4,272.20  Total  Hours Cost \$ \$ 4,272.20  Total  Hours Cost 1,146.40 \$ 386,671.57 252 \$ 784,820.00
Expensis Advances: Total from Breakdown of Casts  2018 Gase CREV, CWS Town of Leeington V, CWS (condemnation) ALC - 120 Centection (VMS V, EPA Total  Expensis Advances Total from Breakdown of Casts  TOTAL Caste CKEV, CWS Town of Leeington V, CWS (condemnation) ALC - 120 Centection CMS V, EPA Total  Formation Total Caste CKEV, CWS Town of Lexington V, CWS (condemnation) Town of Lexington V, CWS (condemnation) Town of Lexington V, CWS (condemnation)	\$ 5,062,94 \$ 47,148,00 \$ 332,808.44 Willoughby Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S   S   S   S   S   S   S   S   S   S	1 \$ 145.00	17 \$ 2,985.00  5 151.08  \$ 3,146.08  Hayroworth  19 \$ 4,225.00  5 5 5  5 5  19 \$ 4,225.00  5 37.20  5 4,272.20  Hayroworth  Hours Cost  5 4,272.20  19 \$ 4,235.00	35 \$ 14,640,000  \$ 803,05 \$ 15,444,95  Baker    Hours   Cost   \$ 5   \$ 7	S   S   S   S   S   S   S   S   S   S	Wilnston   Hours   Cost	1,075 \$ 297,487.50 \$ 5 6,928.97 \$ 47,148.00 \$ 3851,564.47  Total  Hours Cost \$ 5 \$ 9 4,225.00 \$ 5 37.20 \$ 5 \$ 4,722.20  Total  Total  Hours Cost  19 \$ 4,225.00 \$ 7,722.20  Total  Hours Cost  1,9 \$ 4,225.00
Expensis Advances: Total from Breakdown of Casts  2018 Cres CREV. CVIS Town of Leeington V. CWS (condemnation) ALC -120 Connection LWS V. EPA Total Expensis Advances Total from Breakdown of Costs,  TOTAL Case CREV. CWS Town of Leeington V. CWS (Condemnation) ALC - DWC Permit Dental ALC - DWC Permit Dental ALC - LWS Connection	5 5.052.94 \$ 47,148.00 \$ 332,808.44  Wilkoughby  Hours Cost 5 5 5 5 5 5 5 5 5 5 5 6 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5 7	S   S   S   S   S   S   S   S   S   S	1 \$ 165.00      \$ 165.00  Terrent  Mours	17 \$ 2,985.00  \$ 151.08  \$ 3,146.00  Hayneworth  Hours	35 \$ 14,640,000  \$ 804,05 \$ 15,444,95  Baker  Hours Cost \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	S   S   S   S   S   S   S   S   S   S	Wilston   Hours   Cost	1,075 \$ 287,487.50 \$ 6,028.97 \$ 47,148.00 \$ 385,364.47  Total  Hours Cost \$ 5 \$ 4,235.00 \$ 37,20 \$ 4,272.20  Total  Hours Cost \$ 1,54,40 \$ 385,678.75  Total  Hours Cost  1,54,64 \$ 338,678.75  Total  Hours Cost  1,146,40 \$ 386,678.75  Total  Total
Expensis Advances: Total from Breakdown of Casts  2018 Gase CREV, CWS Town of Leeington V, CWS (condemnation) ALC - 120 Centection (VMS V, EPA Total  Expensis Advances Total from Breakdown of Casts  TOTAL Caste CKEV, CWS Town of Leeington V, CWS (condemnation) ALC - 120 Centection CMS V, EPA Total  Formation Total Caste CKEV, CWS Town of Lexington V, CWS (condemnation) Town of Lexington V, CWS (condemnation) Town of Lexington V, CWS (condemnation)	5 5,062,94 \$ 47,148,00 \$ 332,808.44  Willoughby Hours Cost \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	S   S   S   S   S   S   S   S   S   S	1 \$ 145.00	17 \$ 2,985,00  5 151,08  \$ 3,146,08  Hayneworth  Hours	35 \$ 14,640,000  \$ 803,05 \$ 15,444,95  Baker    Nours	S   S   S   S   S   S   S   S   S   S	\$ - Wilnton Hours Cost   S   S   S   S   S   S   S   S   S	1,075 \$ 287,487.50  \$ 6,928,97  \$ 47,148.00  \$ 851,564.47  Total  Hours Cost  \$ 5  \$ 9 4,225.00  \$ 37,20  \$ 4,272.20  Total  Hours Cost  \$ 19 \$ 4,225.00  \$ 19 \$ 4,225.00  \$ 19 \$ 4,225.00  \$ 19 \$ 4,235.00  \$ 19 \$ 4,235.00  \$ 19 \$ 4,235.00  \$ 19 \$ 4,235.00  \$ 19 \$ 1,246.40 \$ 1
Expensis Advances: Total from treakdown of Coats  2018  Case CREV, CWS Town of Leeington V, CWS (condemnation) ALC -142 Censection CWS V, EPA Total  Expensis Advances Total from freakdown of Costs.  TOTAL  Case CMS V, CWS Town of Levington V, CWS (condemnation) ALC -142 Censection CWS V, EPA  Total  Case CMS V, CWS Town of Levington V, CWS (condemnation) ALC -142 Censett Darbal	5 5.052.94 \$ 47,148.00 \$ 332,808.44  Wilkoughby  Hours Cost 5 5 5 5 5 5 5 5 5 5 5 6 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5 7 5 7	S   S   S   S   S   S   S   S   S   S	1 \$ 145.00	17 \$ 2,985,00  5 151,08  \$ 3,146,08  Hayroworth  19 \$ 4,225,00  5 5 5  5 5 5  19 \$ 4,225,00  5 3,7,20  5 4,222,20  Hayroworth  Hours Cost  5 5  5 4,222,20  19 5 4,235,00  5 7 7 9 2,985,10	35 \$ 14,640,000  \$ 804,05 \$ 15,444,95  Baker    Hourn   Cost   \$ 5	S   S   S   S   S   S   S   S   S   S	\$ - Wilnton Hours Cost   \$ 5	1,075 \$ 287,487.50 \$ 6,028.97 \$ 47,148.00 \$ 385,364.47  Total  Hours Cost \$ 5 \$ 4,235.00 \$ 37,20 \$ 4,272.20  Total  Hours Cost \$ 1,54,40 \$ 385,678.75  Total  Hours Cost  1,54,64 \$ 338,678.75  Total  Hours Cost  1,146,40 \$ 386,678.75  Total  Total
Expensis Advances: Total from treakdown of Coats  2018  Case CREV, CWS Town of Leeington V, CWS (condemnation) ALC -142 Censection CWS V, EPA Total  Expensis Advances Total from freakdown of Costs.  TOTAL  Case CMS V, CWS Town of Levington V, CWS (condemnation) ALC -142 Censection CWS V, EPA  Total  Case CMS V, CWS Town of Levington V, CWS (condemnation) ALC -142 Censett Darbal	5 5.052.94 \$ 47,145.00 \$ 332,808.44  Willoughby  Hours Cost \$ 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	S   S   S   S   S   S   S   S   S   S	1 \$ 145.00	17 \$ 2,985,00  5 151,08  \$ 3,146,08  Hayneworth  Hours	35 \$ 14,640,000  \$ 803,05 \$ 15,444,95  Baker    Nours	S   S   S   S   S   S   S   S   S   S	\$ - Wilnton Hours Cost   S   S   S   S   S   S   S   S   S	1,075 \$ 297,487.50 \$ 6,928.97 \$ 47,148.00 \$ 851,564.47  Total  Hours Cost \$ 5 \$ 9 4,225.00 \$ \$ 37.20 \$ 5 \$ 4,727.20  Total  Hours Cost  Hours Cost \$ 19 \$ 4,225.00 \$ 7 7,000 \$ 19 \$ 4,225.00 \$ 19 \$ 4,225.00 \$ 19 \$ 4,225.00 \$ 19 \$ 4,235.00 \$ 19 \$ 1,246.40 \$ 1,246.40 \$ 1,246.40 \$ 1,246.60
Expensis Advances: Total from treakdown of Casts  2018  Case CREV, CVS Town of Leeington V, CVS (condemnation) ALC - 1/20 Censection CVS V, EPA Total  Expensis Advances Total from teckdown of Costs.  Total Case CSE V, CVS Town of Levington V, CVS (condemnation) ALC - 1/20 Censection CVS V, EPA Total  Case CSE V, CVS Town of Lovington V, CVS (condemnation) ALC - 1/20 Censection CVS V, EPA Total Total Case CSE V, CVS Town of Lovington V, CVS (condemnation) ALC - 1/20 Censection CVS V, EPA Total	5 5,062,94 \$ 47,148,00 \$ 47,148,00 \$ 332,808.44  Willoughby Hours Cost \$ 5 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	S   S   S   S   S   S   S   S   S   S	1 \$ 145.00	17 \$ 2,985,00  5 151,08  \$ 3,146,08  Haynoworth  Hours	35 \$ 14,640,00  S 803,05  S 15,444,95  Baker  Hours Cost  S 5  S 5  S 7  S 14,640,00  Baker  Hours Cost  S 5  S 7  S 7  S 7  S 7  S 7  S 7  S 7	S   S   S   S   S   S   S   S   S   S	\$ - Wilnton  Hours Cost   S   S   S   S   S   S   S   S   S	1,075 \$ 287,487.50  \$ 6,032,97 \$ 47,148.00 \$ 851,564.47  Total  Hours Cost \$ 5 \$ 9 4,235.00 \$ \$ 37.20 \$ 4,225.00  Total  Total  Total  Hours Cost \$ 19 \$ 4,225.00  \$ 19 \$ 4,225.00  \$ 19 \$ 4,225.00  \$ 19 \$ 4,225.00  \$ 19 \$ 4,235.00  \$ 19 \$ 4,235.00  \$ 19 \$ 4,235.00  \$ 19 \$ 1,246.40  \$ 1,246.40

## APPENDIX C: AFFIDAVIT OF JOHN M. S. HOEFER

#### **BEFORE THE**

#### PUBLIC SERVICE COMMISSION

#### OF SOUTH CAROLINA

#### **DOCKET NO. 2017-292-WS**

IN RE:	)	
Application of Carolina Water Service, Inc.	)	
for an Increase in Its Rates for Water and	)	AFFIDAVIT
Sewer Services	)	
	j	

Before me personally appeared John M. S. Hoefer, who having first been duly sworn, deposes and states as follows:

- 1. I am over 18 years of age and competent to make this affidavit.
- 2. I am a founder and shareholder of Willoughby & Hoefer, P.A. ("Firm") and am primarily responsible for its representation of Carolina Water Service, Inc. ("CWS") in the litigation matters referenced in Public Service Commission of South Carolina ("Commission") Order Number 2018-494-WS in the above-captioned docket.
- 3. I, along with Randolph R. Lowell, Chad N. Johnston, and Elizabeth S. Mabry of the Firm, have provided legal representation services to CWS in the following five (5) civil actions and administrative proceedings:
  - (a) Congaree Riverkeeper, Inc. v. Carolina Water Service, Inc., United States
    District Court, Case Number 3:15-CV-194-MBS;

- (b) Carolina Water Service, Inc. v. Regina McCarty, Administrator, United States Environmental Protection Agency, and Town of Lexington, South Carolina, United States District Court Case Number 3:15-49419-MBS;
- (c) Carolina Water Service, Inc. v. South Carolina Department of Health and Environmental Control and Congaree Riverkeeper, Inc., South Carolina Administrative Law Court, Docket No. 16-ALJ-07-0340-CC;
- (d) South Carolina Department of Health and Environmental Control v. Carolina Water Service, Inc., South Carolina Administrative Law Court, Docket No. 16-ALJ-07-0341-CC, and
- (e) Town of Lexington v. Carolina Water Service, Inc. and Utilities, Inc., South Carolina Court of Common Pleas, Eleventh Judicial Circuit, Civil Action Number 2017-CP-32-03693.

The Firm has served as lead counsel in the District Court and Administrative Law Court cases, and as associate counsel with Joe A. Conner and Adam C. Sanders of the law firm of Baker, Donelson, Bearman, Caldwell and Berkowitz, P.C., in the Circuit Court case.

- 4. Each attorney involved in this matter has worked faithfully, diligently, and efficiently during the time which he or she has expended on these cases.
- 5. The Firm's standard hourly rates for litigating matters in the above-referenced forums for each participating attorney are significantly higher than those charged CWS in these cases. This is primarily due to the fact that the Firm has a long-standing relationship with CWS, which now spans three decades and the volume of work that the Firm has historically performed for CWS.

- 6. These cases all arise from a single issue, namely the initial inability and subsequent refusal of the Town of Lexington ("Town") to provide CWS with a wholesale service connection which would allow for the elimination of the discharge of treated wastewater into the Lower Saluda River by CWS from its I-20 System pursuant to its National Pollutant Discharge Elimination System ("NPDES") permit issued by the South Carolina Department of Health and Environmental Control. The Town is required to either offer wholesale service or acquire the I-20 System by the Water Quality Management Plan adopted by the Central Midlands Council of Governments under 33 U.S.C.A. §1288(c) and South Carolina law. Because these matters arose from that one issue, the Firm's invoices for legal services, expenses, and costs were submitted in a block billing format as has long been its practice in matters it has undertaken on behalf of CWS other than ratemaking proceedings before the Commission.
- 7. At the request of CWS, I have personally reviewed the Firm's invoices for services in these cases for the purpose of assigning the time spent on legal services and costs advanced to each individual case and have supplied that information to CWS counsel. A summary of the time spent on legal services, associated fees, and costs advanced in each of these cases as a result of my review is attached hereto and incorporated herein as Exhibit A. A summary of the time spent by each attorney from the Firm who has worked on these matters is attached hereto and incorporated herein as Exhibit B.
- 8. These cases, other than that identified in paragraph 3(b) above, remain pending. Therefore, the amount of fees associated with litigating the matters encompassed therein may be expected to increase. Nonetheless, my affidavit pertains only to legal services provided during the period September 1, 2015, through February 12, 2018, CWS has already incurred additional legal fees in these matters.

3 will

9. The Firm's attorneys' fees represent time which was expended in the good faith, diligent research, preparation, drafting, and argument in these matters.

#### FURTHER AFFIANT SAYETH NOT.

John M. S. Hoefer

Sworn to and Subscribed Before Me This 2 rd day of August, 2018.

Notary Public for South Carolina.

My Commission Expires: 3/3/



Exhibit A Page 1 of 5

### CRK v CWS

Total Hours	1515
Total Fees	\$375,403.50
Total Costs Advanced	\$21,662.23
Total Billed	\$397,065.73

Exhibit A Page 2 of 5

#### Town of Lexington v CWS

Total Hours	198.30
Total Fees	\$59,607.00
Total Costs Advanced	\$52,108.05

Total Billed \$111,715.05

Exhibit A Page 3 of 5

#### **ALC - DHEC Permit Denial**

Total Hours	844.90
Total Fees	\$232,915.50
Total Costs Advanced	\$428.25
Total Billed	\$233,343.75

Exhibit A Page 4 of 5

#### ALC - I-20 Connection

Total Hours	174.80
Total Fees	\$47,641.50
Total Costs Advanced	\$600.00
Total Billed	\$48,241.50

Exhibit A Page 5 of 5

#### CWS v EPA

Total Hours	580.65
Total Fees	\$146,270.25
Total Costs Advanced	\$29.70
Total Billed	\$146,299.95

# CRK v CWS

	ᅩ	RRL	BPM	TCG	CNJ	JWR	ESM	Paralegal
Total Hours	325.50	165.20	16.00	09.0	985.10	0.50	00.00	22 50
Hourly Rate	\$315.00	\$270.00	\$270.00	\$270.00	\$225.00	\$225.00	\$315.00	\$90.00
Total Fees	\$102,532.50	\$44,604.00	\$44,604.00 \$4,320.00	\$162.00	\$162.00 \$221,647.50	\$112.50	\$0.00	\$2 025 00

\$375,403.50

\$21,662.23

Total Costs Advanced

**Total Fees** 

**Total Billed** 

\$397,065.73

Exhibit B Page 1 of 5

Exhibit B Page 2 of 5

Town of Lexington v CWS

ESM Paralegal		7.50	\$315.00	\$0.00 \$2.362.50
JWR		00.00	\$225.00	\$ 00 0\$
CNJ		25.90	\$225.00	\$5 827 50
TCG		00.00	\$270.00	\$0.00
BPM		0.00	\$270.00	\$0.00
RRL		11.70	\$270.00	\$3.159.00
F)		153.20	\$315.00	\$48,258.00
	1	Total Hours	Hourly Rate	Total Fees

\$59,607.00	\$52,108.05	\$111,715.05
Total Fees	Total Costs Advanced	Total Billed

ALC - DHEC Permit Denial

JWR ESM Paralegal		20 0.00 0.00	00 \$225.00 \$315.00	00 00 00 00 00
CND		346.20	\$225.00	\$77,895,00
TCG		0.40	\$270.00	\$108.00
BPM		1.00	\$270.00	\$270.00
RRL		44.60	\$270.00	\$12,042.00
프		452.70	\$315.00	\$142,600.50
		Total Hours	Hourly Rate	Total Fees

\$232,915.50	\$428.25	\$233,343.75
Total Fees	Total Costs Advanced	Total Billed

Exhibit B Page 4 of 5

ALC - I-20 Connection

	H	RRL	BPM	TCG	CNJ	JWR	ESM	Paralegal
Total Hours	81.90	20.90	00.00	00.0	72.00	00.00	00.0	0
		:						
Hourly Rate	\$315.00	\$270.00	\$270.00	\$270.00	\$225.00	\$225.00	\$315.00	
•								
Total Fees	\$25,798.50	\$5,643.00	\$0.00	\$0.00	\$16,200.00	\$0.00	\$0.00	\$0.00

\$47,641.50	\$600.00	\$48,241.50
Total Fees	Total Costs Advanced	Total Billed

M Paralegal	)   	0.00	\$315.00	\$0.00
JWR ESM		00.00	\$225.00 \$31	\$0.00
CNJ		346.85	\$225.00	\$78,041.25
TCG		00.00	\$270.00	\$0.00
BPM		00.00	\$270.00	\$0.00
RRL		120.40	\$270.00	\$32,508.00
Ŧ		113.40	\$315.00	\$35,721.00
		Total Hours	Hourly Rate	Total Fees

\$29.70

**Total Costs Advanced** 

**Total Fees** 

**Total Billed** 

\$146,299.95

\$146,270.25